

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT AND ARREST WARRANT

I, Joshua Thornton, being duly sworn, do hereby depose and state:

Introduction/Affiant Background

I make this affidavit in support of a complaint charging STEVEN KEITH STAGGERS JR. (“STAGGERS”) with violating Title 18 United States Code Section 922(g)(1), Possession of Firearms and Ammunition by a Prohibited Person on September 20, 2023 and November 29, 2024.

I am a Special Agent (“SA”) with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) and an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

I have been a Special Agent with ATF since 2023 and am currently assigned to the Baltimore Field Division, Group III. I have successfully completed the Department of Homeland Security’s Criminal Investigator Training Program and ATF’s Special Agent Basic Training in Glynco, Georgia, for a combined training period of 27 weeks. I have participated in investigations concerning the illegal possession of firearms, violations of controlled substance laws, and the commission of violent crimes by organized gangs. As an ATF Special Agent, I have received specialized training in various types of investigative activities, including, but not limited to: (a) physical surveillance; (b) the debriefing of defendants, witnesses, informants, and other individuals with knowledge of firearms and controlled substance laws; (c) undercover operations; (d) the execution of search warrants; (e) the consensual monitoring and recording of conversations; (f) electronic surveillance (g) use of pen registers and trap and trace devices; (h) handling and maintenance of evidence.

The statements in this affidavit come from my training, experience, and familiarity with this investigation. They are based on my own personal knowledge of events as well as information I have learned from other law enforcement agents. Because this affidavit merely seeks to establish probable cause for a criminal complaint and arrest warrant, I have not included every fact I know about this investigation. However, I have not left out any fact that I believe would defeat a probable cause finding.

Probable Cause

Events of September 20, 2023

On September 12, 2023, the Honorable William Dunn, of the District Court of Maryland for Baltimore City, authorized a search and seizure warrant at 17 Bon Air Avenue, Brooklyn Park, MD – the residence of Steven STAGGERS – in relation to a state investigation of STAGGERS’ illegal possession of firearms. On September 20, 2023, Baltimore Police Department (BPD), Anne Arundel County Police Department (“AAPD”), and Maryland State Police (“MSP”) executed the search warrant, during which STAGGERS was present at the residence along with Andrea Walker (the mother of STAGGERS’ children), their children, and other adults. In the master bedroom, investigators recovered a personal check in the name of “Steven K Staggers Jr” as well as a provisional driver’s license in STAGGERS’ name in the top drawer of the bedroom dresser. In the bedroom vanity drawer, investigators recovered a healthcare document bearing STAGGERS’ name with the address “17 Bon Air Avenue, Brooklyn, MD 21225.” Additionally, investigators recovered the following items from the master bedroom:

- One Glock 26 pistol bearing serial #2VG554 containing approximately 19 rounds of 9mm ammunition

- One box of Lawmen ammunition containing approximately 18 rounds of .40 caliber ammunition
- One black "Amend 2" brand handgun magazine
- One box of Federal Premium ammunition with approximately 13 rounds of 9mm ammunition
- Approximately 11 loose rounds of various calibers of ammunition

In the dining room, investigators recovered a clear plastic bag containing approximately 26 grams of cocaine, as confirmed by the Anne Arundel County Police Department, Forensic Services Section. Also in the dining room, investigators recovered a black "Weigh Gram" digital scale containing a white residue, two clear bags containing approximately 40 grams of suspected "cutting" agent, and three loose rounds of ammunition of various calibers. Based on my training, knowledge, and experience, I know that cocaine is a Schedule II controlled substance and that paraphernalia like a digital scale and cutting agents are common indicators of an individual's distribution of a controlled dangerous substance (CDS).

From the children's playroom upstairs, investigators recovered a black Glock 45 bearing serial #BTAE100 with an extended magazine containing 32 rounds of 9mm ammunition. Investigators also recovered a second firearm magazine nearby.

Based on my review of STAGGERS' criminal history, I know that STAGGERS was, and remains, a prohibited person due to a 2022 conviction for robbery¹ for which he received a sentence of eight years confinement, six years suspended, plus two years of probation. As a result of this conviction, prior to the conduct detailed above and below, STAGGERS had been convicted of a crime punishable by imprisonment for a term exceeding one year. In addition, due to his

¹ Circuit Court for Baltimore City Case Number: 121019011

sentence and his time served there is probable cause to believe that STAGGERS knew of his status as a felon.

Upon discovering the firearms, ammunition, and CDS during the September 20, 2023 search warrant, investigators arrested STAGGERS on state charges related to firearm and drug possession. However, in October 2023, the state charges against STAGGERS were dismissed by the State Attorney's Office in Anne Arundel County, Maryland, and STAGGERS was released from jail.²

The Glock 26 pistol bearing serial #2VG554, the black Glock 45 bearing serial #BTAE100, and the assorted ammunition referenced above were examined by an ATF Nexus Expert, who determined they were not manufactured in the state of Maryland and therefore affected interstate commerce. The firearms were also test fired and were deemed operable.

Events of November 29, 2024

On November 29, 2024 at approximately 10:03 p.m., the Baltimore County Police Department (BCPD) received a Shot-Spotter³ alert for the 3800 block of McDowell Lane in Lansdowne, Maryland. While officers were responding, BCPD received a 911 call from a female stating that her friend had been shot. Once on scene, officers located STAGGERS suffering from a gunshot wound to his back and leg. Officers treated STAGGERS on location, and he was transported to the University of Maryland, Shock Trauma Hospital in Baltimore where he was stabilized. While administering aid to STAGGERS, law enforcement recovered two rounds of FC brand 9mm ammunition from his pants pocket.

² Based on a review of documentation and my understanding of the procedural history, I know that the case was not dismissed for lack of evidence but rather due to a suppression issue related to the inclusion of facial recognition information in the premises search warrant application for 17 Bon Air Avenue address, which yielded the firearms, drugs, and iPhone.

³ A gunshot detection system that uses sensors to identify, locate, and notify law enforcement of gunfire in real time.

Detectives located a cell phone and empty .40 caliber pistol magazine in between the location of the shooting and the location where STAGGERS was found. Based on these circumstances, the late hour at which the shooting occurred (and when fewer people were around), and my training and experience, I believe the cell phone and empty .40 caliber pistol magazine belonged to STAGGERS.

Early in the investigation, detectives recovered footage from a privately owned Wyze Camera mounted in the direction of the shooting. The video footage shows a white sedan, later identified as a Nissan Altima with unknown registration, parked on McDowell Lane with its headlights activated. An individual is observed approximately 20 to 30 feet away opening the door to another sedan parked behind the white sedan. After a few seconds, a large black SUV enters the picture, and two occupants exit. Multiple muzzle flashes are visible coming from the white sedan towards the black SUV. Two more people exit the black SUV from the rear passenger door and three shooters return gunfire in the direction of the white sedan. The white sedan then flees the location, and the black SUV departs soon after. STAGGERS was located by first responders in the direction of the white sedan. Based on the cartridge casings recovered from the scene of the shooting, investigators know that 6 separate firearms were used in the incident.

The above described two rounds of FC brand 9mm ammunition that were recovered from STAGGERS' pocket were examined by an ATF Nexus Expert, who determined they were not manufactured in the state of Maryland and therefore affected interstate commerce.

KSC/01.31.25
JGO: USAO#2024R00609

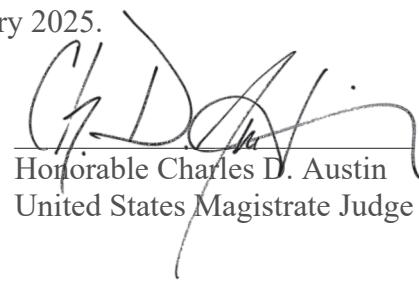
Conclusion

I request that the Court issue a Complaint and Arrest Warrant for STEVEN KEITH STAGGERS JR for violating Title 18 United States Code Section 922(g)(1), Possession of Firearms and Ammunition by a Prohibited Person on September 20, 2023 and November 29, 2024.

Affiant: JOSHUA THORNTON Digitally signed by JOSHUA THORNTON
Date: 2025.01.31 14:34:31 -05'00'

Joshua Thornton
Special Agent
ATF

Sworn to me via telephone this 3rd day of February 2025.


Honorable Charles D. Austin
United States Magistrate Judge